

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:

BK. No. 18-17497 AMC

ANGIE D. VALENTIN

D/B/A UNITY INVESTMENTS, LLC

Chapter No. 13

Debtor

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**THE BANK OF NEW YORK MELLON, F/K/A
THE BANK OF NEW YORK AS SUCCESSOR
IN INTEREST TO JPMORGAN CHASE BANK,
N.A. AS TRUSTEE FOR NOVASTAR
MORTGAGE FUNDING TRUST, SERIES 2005-
1, NOVASTAR HOME EQUITY LOAN ASSET-
BACKED CERTIFICATES, SERIES 2005-1**

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Movant

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v.

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ANGIE D. VALENTIN

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D/B/A UNITY INVESTMENTS, LLC

WILLIAM CLAUDIO

Respondents

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

**THE BANK OF NEW YORK MELLON, F/K/A THE BANK OF NEW YORK
AS SUCCESSOR IN INTEREST TO JPMORGAN CHASE BANK, N.A. AS TRUSTEE FOR
NOVASTAR MORTGAGE FUNDING TRUST, SERIES 2005-1, NOVASTAR HOME
EQUITY LOAN ASSET-BACKED CERTIFICATES, SERIES 2005-1** has filed a Motion for
Relief from the Automatic Stay and Co-Debtor Stay with the Court for Limited Purpose of
Completing Loan Modification on **2137 NORTH HOPE STREET, PHILADELPHIA, PA 19122-
1708**.

**Your rights may be affected. You should read these papers carefully and discuss
them with your attorney, if you have one in this bankruptcy case. (If you do not have an
attorney, you may wish to consult an attorney.)**

1. If you do not want the Court to grant relief sought in the motion or if you want
the Court to consider your views on the motion, then on or before 02/11/2020 you or your attorney
must do all of the following:

(a) file an answer explaining your position at:

CLERK'S OFFICE, U.S. BANKRUPTCY COURT
THE ROBERT NIX BUILDING
900 MARKET STREET
PHILADELPHIA, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the Movant's attorney:

PHELAN HALLINAN DIAMOND & JONES, LLP
1617 JFK Boulevard, Suite 1400
One Penn Center Plaza
Philadelphia, PA 19103

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the Court may enter an Order granting the relief requested in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable ASHELY M. CHAN on 02/18/2020 at 11:00 AM , in Courtroom 4, United States Bankruptcy Court, The Robert Nix Building, 900 Market Street, Philadelphia, PA 19107. Unless the Court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorneys named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office at (215) 408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

January 23, 2020